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10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**  
12 **SACRAMENTO DIVISION**

13  
14 BARBARA L. BONKOFSKY, } Case No.: 2:23-cv-02690-AC  
15 Plaintiff, } STIPULATION AND [PROPOSED] ORDER  
16 vs. } FOR AN EXTENSION OF TIME  
17 COMMISSIONER OF SOCIAL SECURITY, )  
18 Defendant. }  
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21 Pending the Court's approval, the parties hereby stipulate that the time for Defendant to  
22 respond to Plaintiff's Motion for Summary Judgment be extended four (4) days from April 29,  
23 2024, up to and including May 3, 2024.

24 This is Defendant's second request for an extension, and it is made with good cause.  
25 Defendant's counsel has worked diligently to meet the timelines provided by the Court but has  
26 been prevented from doing so by having to take unanticipated medical leave. Defendant requests  
27 this extension in good faith and with no intent to delay these proceedings unnecessarily.  
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The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: April 23, 2024

/s/ John David Metsker\*  
(\*as authorized via e-mail on April 23, 2024)  
JOHN DAVID METSKER  
Attorney for Plaintiff

Dated: April 23, 2024

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By: /s/ Mary Tsai  
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Attorneys for Defendant

## **ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including May 3, 2024, to respond to Plaintiff's Motion for Summary Judgment.

DATED: April 24, 2024

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE